

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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WATCH TOWER BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA,

Plaintiff,

-against-

THE TRUTH AND TRANSPARENCY FOUNDATION,
RYAN C. McKNIGHT, and ETHAN G. DODGE,

Defendants.

No. 1:20-cv-03366 (MKV)

[PROPOSED] FINAL JUDGMENT AND PERMANENT INJUNCTION ON CONSENT

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Watch Tower Bible and Tract Society of Pennsylvania (“Watch Tower”) and Defendants The Truth and Transparency Foundation, Ryan C. McKnight, and Ethan G. Dodge (together, “Defendants”), that this Final Judgment and Permanent Injunction on Consent be entered in the present action as set forth below without further notice or process:

WHEREAS, Watch Tower is responsible for the creation and publication of works of authorship including literary works, works of visual art, musical works, and motion pictures;

WHEREAS, Defendants without permission or license copied, reproduced, publicly displayed, publicly performed and distributed the 74 registered copyrighted motion pictures of Watch Tower identified on Schedule A hereto (the “Copyrighted Works”); and

WHEREAS Watch Tower and Defendants have agreed to end this dispute on terms that include the entry of this Final Judgment and Permanent Injunction on Consent, and have consented to the entry of this Final Judgment and Permanent Injunction on Consent;

NOW THEREFORE, upon the consent and request of Watch Tower and Defendants, **IT IS HEREBY ORDERED, ADJUDGED, and DECREED** that:

1. Defendants, and their agents, representatives, employees and other persons and entities acting in concert with them, are permanently enjoined, restrained and prohibited from

(a) using or causing to be used, or inducing, authorizing or facilitating any third party to use, any of the Copyrighted Works in any medium including but not limited to the *faithleaks.org* website, and any other website operated or controlled, in whole or in part, by Defendants or any of them; and

(b) using or causing to be used, or inducing, authorizing or facilitating any third party to use, any copyrighted works other than the Copyrighted Works, now in existence or to be created in the future, that are owned by Watch Tower or by entities that cooperate with Watch Tower.

2. No bond or posting of security is required in connection with the entry of this Permanent Injunction.

3. All of the parties waive the right to appeal from or otherwise contest this Final Order and Judgment on Consent, which may be entered in the form and content set forth above without further notice to any party.


Dated: September 30, 2020

/s/ Thomas Kjellberg
Thomas Kjellberg (txk@cjl.com)
COWAN, LIEBOWITZ & LATMAN, P.C.
114 West 47th Street
New York, NY 10036-1525
(212) 790-9200

Dated: September 30, 2020

/s/ Ryan E. Long
Ryan E. Long (rlong@landapllc.com)
LONG & ASSOCIATES PLLC
135 West 27th Street, 8th Floor
New York, New York 10001
(212) 381-9637

IT IS SO ORDERED this 2 day of October, 2020.



Mary Kay Vyskocil
United States District Judge

The Clerk of Court is respectfully directed to terminate the motions pending at docket entries 24 and 26 and then to close this case.